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PEB: USAO 2022R00245

USDC - BALTIMORE
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

RICHARD WESLEY ROBINSON,

Defendant.

CRIMINAL NO. ELH-22-148

**(Coercion and Enticement, 18 U.S.C. §
2422(b); Forfeiture, 18 U.S.C. § 2428, 21
U.S.C. § 853(p), 28 U.S.C. § 2461(c))**

SUPERSEDING INFORMATION

COUNT ONE

(Coercion and Enticement)

The United States Attorney for the District of Maryland charges that:

On or about July 17, 2018, in the District of Maryland, the defendant,

RICHARD WESLEY ROBINSON,

using any facility and means of interstate and foreign commerce, knowingly attempted to and did persuade, induce, entice, and coerce John Doe 1, who had not attained the age of 18 years, to engage in any sexual activity for which any person can be charged with a criminal offense.

18 U.S.C. §§ 2422(b), 2427

FORFEITURE ALLEGATION

The United States Attorney for the District of Maryland further alleges that:

1. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 2428, 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c), in the event of the defendant's conviction under Count One of this Superseding Information.

Coercion and Enticement Forfeiture

2. Pursuant to 18 U.S.C. § 2428(a), upon conviction of the offense set forth in Count One of this Superseding Information, the defendant,

RICHARD WESLEY ROBINSON

shall forfeit to the United States:

- a. any interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation; and
- b. any property, real or personal, constituting or derived from any proceeds that such person obtained, directly or indirectly, as a result of such violation.

3. The property to be forfeited includes, but is not limited to, the following:

- a. A Samsung SM-A505U Galaxy A50 cell phone, IMEI number 353335110573527;
- b. LG model VS985 4G cell phone, serial number 501KPHG0452873;
- c. LG model VS985 cell phone, IMEI number 352452067169661, and
- d. HP Desktop computer, serial number MXG60802QJ.

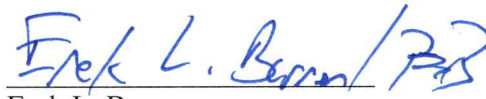
Substitute Assets

4. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

18 U.S.C. § 2428(a)
21 U.S.C. § 853(p)
28 U.S.C. § 2461(c)


Erik L. Barron
United States Attorney

Date: July 19, 2023